July 20, 2004

- LICENSEE: Southern Nuclear Operating Company
- FACILITY: Joseph M. Farley Nuclear Plant, Units 1 and 2
- SUBJECT: SUMMARY OF TELEPHONE CONFERENCES ON JULY 6, 12, AND 16, 2004, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND THE SOUTHERN NUCLEAR OPERATING COMPANY CONCERNING THE REVIEW FOR THE JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2, LICENSE RENEWAL APPLICATION (TAC NOS. MC0774 AND MC0775)

The U.S. Nuclear Regulatory Commission staff and representatives of Southern Nuclear Operating Company (SNC or the applicant) held telephone conferences on July 6, 12, and 16, 2004, to discuss applicant's responses to requests for additional information (RAIs), staff's draft requests for additional information (D-RAIs), and other questions pertaining to the Joseph M. Farley Nuclear Plant (FNP) license renewal application.

These conference calls were useful in clarifying the intent of the staff's questions. On the basis of the discussion, the applicant was able to better understand the staff's questions. No staff decisions were made during these telephone conferences. In some cases, the applicant agreed to provide information for clarification.

Enclosure 1 provides a list of these telephone conferences participants. Enclosure 2 contains a listing of the RAIs, D-RAIs, questions discussed with the applicant, including a brief description on the status of the items. The applicant has had an opportunity comment on this summary.

/RA/

Tilda Y. Liu, Senior Project Manager License Renewal Section A License Renewal and Environmental Impacts Program Division of Regulatory Improvement Programs Office of Nuclear Reactor Regulation

Docket Nos.: 50-348 and 50-364

Enclosures: As stated

cc w/enclosures: See next page

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July 6, 2004

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July 12, 2004

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July 16, 2004

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REVIEW OF LICENSE RENEWAL APPLICATION (LRA) FOR FARLEY UNITS 1 AND 2

July 6, 2004

On July 2, 2004, the staff sent the following question, via e-mail, to the applicant regarding its review of the LRA. The staff's question and the associated discussion with the applicant are presented below:

Section 3.1.2.2.2: Loss of Material Due to Pitting and Crevice Corrosion

In Farley LRA, Table 3.1.2-4, Page 3.1-79, for upper shells, lower shells, and transition cone component type, FNP has credited water chemistry control program for loss of material aging effect. The LRA also references GALL Section IV.D1.1-c, Table 1 Item 3.1.1-2, and Footnote "A". Footnote "A" is defined as "consistent with NUREG-1801 item for component, material, environment, and aging effect. AMP is consistent with NUREG-1801 AMP."

However, GALL Item IV.D1.1-c recommends water chemistry control program (WCCP) and ISI to manage this aging effect. Thus, Footnote "A" is not applicable and perhaps Footnote "E" applies. Also, SRP Section 3.1.2.2.2 states that WCCP and ISI may not be enough, and augmented inspections may be required. In LRA section 3.1.2.2.2, FNP states that WCCP is used for loss of material, but ISI is used for cracking. This section only addresses loss of material due to pitting and crevice corrosion. Also, in conclusion FNP states that no augmented inspections are required, since the steam generators were replaced and since then, water chemistry has been maintained per EPRI standards. But, the LRA did not state that ISI will be performed for loss of material or that the ISI that is performed for managing cracking would also be used for loss of material.

Please clarify if WCCP and ISI are intended to be used for loss of material, if not, should the note be changed to Footnote "E", and the rationale for not performing ISI for loss of material, if it is already being performed for cracking.

Discussion: The applicant indicated that it understood the question, and agreed to provide a supplemental response to this question.

REVIEW OF LICENSE RENEWAL APPLICATION (LRA) FOR FARLEY UNITS 1 AND 2 DRAFT REQUESTS FOR ADDITIONAL INFORMATION (RAI)

July 12, 2004

Section B.5.9-1: Periodic Surveillance and Preventive Maintenance Activities (PSPMA) Program

D-RAI B.5.9-0

The staff requests the applicant to provide a Final Safety Analysis Report supplement for the PSPMA program.

Discussion: The applicant stated that the requested information will be included and forthcoming as part of its submittal, "Farley Nuclear Plant – License Renewal Future Action Commitment." Therefore, this question is WITHDRAWN and will not be sent as a RAI.

<u>D-RAI B.5.9-1</u>

The staff requests the applicant to provide the following information related to PSPMA program:

- a. Explain how inspections for the presence of corrosion products or fluid leakage, wall thickness, pressure, temperature, and flow will be used to detect the presence and extent of aging effects for the internal elastomer tank diaphragms.
- b. State the diaphragm inspection frequency for boric acid tanks, reactor makeup water storage tanks, and condensate storage tanks and the basis for determining this frequency.
- c. Explain how the data collected are evaluated against the acceptance criteria to provide a prediction of the rate of degradation in order to confirm that the timing of the next scheduled inspection will occur before a loss of intended function.
- d. Provide plant-specific and industry operating experience for degradation of internal elastomer tank diaphragms to support the conclusion that the diaphragms will be adequately managed by the PSPMA or commit to providing operating experience in the future to confirm the effectiveness of the new PSPMA.

Discussion: The applicant indicated that it understood the question. This D-RAI will be sent as a formal RAI.

REVIEW OF LICENSE RENEWAL APPLICATION (LRA) FOR FARLEY UNITS 1 AND 2 FOLLOW-UP TO REQUESTS FOR ADDITIONAL INFORMATION (RAI)

July 16, 2004

On July 14, 2004, the staff sent the following question, via e-mail, to the applicant for following up on the applicant's response to RAI B.5.2-1. The staff's follow-up question and the associated discussion with the applicant are presented below:

Follow-up to RAI B.5.2-1

The applicant stated the following for its response to RAI B.5.2-1:

All accessible flux thimble tubes are inspected using ECT at each scheduled inspection. Flux thimble tubes which have been previously capped, or which are obstructed, cannot be inspected. The flux thimble tubes are inspected over their full length from the seal table to the nose of the tube at the top of the core. SNC will continue to inspect all accessible flux thimble tubes at each scheduled inspection. See the response to RAI B.5.2-3 to address scheduling of these inspections.

It appears that the applicant is capping or repositioning all thimble tubes that it has inspected and determined that an unacceptable amount of wear has occurred in the tubes. However, the response to the RAI indicates that the applicant will continue to perform inspections of 100% of the thimble that are accessible for inspection over the entire length from the seal table to the top of the core. The staff requests clarification whether the applicant is proposing to assure the structural integrity for thimble tubes that are obstructed from Eddy Current Testing (ECT) examinations or restricted from ECT examinations? In other words, is the applicant capping them and removing them from service or taking some other form of corrective action?

The staff has a copy of an inspection evaluation from Westinghouse to SNC giving the results and evaluation of the ECT examinations on the Farley Unit 2 thimble tubes performed during Unit 2 refueling outage 15. It indicates that thimble tubes C12 and L05 were obstructed from ECT examinations and thimble tubes J07, J15, L11, N08, and R08 were restricted from the ECT examinations along certain portions of the inspected length defined in the response to RAI B.5.2-1. The NRC's audit report, dated January 20, 1990, to Alabama Power Company, states one of the old thimble tubes at Farley Unit 1 as capped because it was blocked and could not be inspected. The staff seeks clarification as to what corrective actions are being taken to ensure the structural integrity of thimbles tubes that are totally obstructed or partially restricted to the ECT examinations.

Discussion: The applicant indicated that it understood the question, and agreed to provide a supplemental response to this question.

Joseph M. Farley Nuclear Plant

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